

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	)	
	)	
v.	)	<b>No. 08-CR-181</b>
	)	
MARIO S. LEVIS	)	
_____	)	

**DEFENDANT’S MOTION FOR LEAVE TO EXCEED THE  
PAGE LIMIT ON HIS OMNIBUS REPLY MEMORANDUM**

Defendant MARIO S. LEVIS (“Levis”), through undersigned counsel, respectfully moves this Court for permission to exceed the ten (10) page limit for reply memoranda specified in the Court’s list of Individual Practices, and states as follows:

1. Levis has filed several pretrial motions, including a motion to transfer the case to the District of Puerto Rico, and a motion to compel disclosure of a witness list, exhibit list, and Rule 404(b) evidence not later than ninety (90) days before trial.
2. The government responded substantively to the motion to transfer venue and the motion to compel in a fifty-three (53) page response memorandum.
3. Levis’s omnibus reply, filed simultaneously herewith, addresses both the motion to transfer and the motion to compel. It is seventeen (17) pages long.
4. For the motion to transfer venue, Levis must examine all ten *Platt* factors considered by courts in determining the propriety of such a transfer. This task alone cannot be condensed into less than ten (10) pages.

WHEREFORE defendant Mario S. Levis respectfully asks this Court for leave to exceed the Court's page limit and file a seventeen (17) page reply addressing both the motion to transfer venue and the motion to compel.

Respectfully submitted,

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